

Price Pfister, Inc. Response to EPA 104(e) Requests

EPA Request	Response
1. State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Price Pfister, Inc. (the "Company").	<p>Linda H. Biagioni Vice President Price Pfister, Inc. 701 East Joppa Road Towson, MD 21286 Phone: (410) 716-3208 Fax: (410) 716-2341</p> <p>Mrs. Biagioni has been with Price Pfister, Inc. ("Price Pfister") for approximately fifteen (15) years.</p>
2. Please provide one or more contact names and current contact information (address and phone number) for individuals within the Company who are familiar with the Consent Decree and the basis for the Company's involvement as a signatory to the Consent Decree.	Please see response to 1. above.
3. The Consent Decree defines Price Pfister, Inc. as a "Settling Defendant," describing it as a party who was not sued by the governments but who was related to one or more of the other defendants or to the property where such other defendants operated. (Section II.O). Please explain the circumstances under which the Company was originally brought into the litigation and/or negotiations surrounding the Consent Decree, including the identity of the party who brought the Company into the litigation, a description of the relationship between the Company and such party or property, and a summary of the reasoning or claims alleged by such party as a basis for the Company's involvement.	<p>Price Pfister is still reviewing its files concerning the Second Partial Consent Decree in <i>United States of America v. Allied Signal, Inc., et al</i>, Civil No. 93-6490-MRP which was filed with the U.S. Central District Court on May 12, 1997 and entered into on May 14, 1997 ("Consent Decree"). Attachment A. As stated in the March 30, 1995 letter from Raul Montes. Attachment B. Los Angeles By-Products named Price Pfister as a third party defendant. Los Angeles By-Products based its claim on (1) alleged use of the Los Angeles By-Products' landfills by Price Pfister Brass Manufacturing Company from October 1963 to January 1978, and (2) alleged releases of chlorinated solvents at the Price Pfister Facility which have impacted the North Hollywood Operable Unit Site ("NHOU Site").</p> <p>Price Pfister chose to settle the matter in exchange for modest payments (\$5,200 to the United States and \$300 to the State of California) because the settlement reserved any and all defenses or rights Price Pfister may have with respect to the NHOU. See Paragraph VI.G.</p>
4. Identify the individuals who are or were responsible for environmental matters at the Company's facility located at 13500 Paxton Street, Pacoima, California (the "Facility"). Henceforth, the term "Facility" shall be interpreted to include both the real property at 13500 Paxton Street and any improvement thereto. For each individual responsible for	Response deferred pursuant to agreement with EPA.

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environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.	
5. Explain the Company's present operational status (e.g., active, suspended, defunct, merged, or dissolved).	Price Pfister is an active corporation.
6. Provide the date the Company was incorporated, formed or organized. Identify the State in which the Company was incorporated, formed or organized.	<p>Price Pfister understands that in 1969, Norris Industries, Inc. a California corporation, purchased all the stock of Price Pfister Brass Manufacturing Company. In December 31, 1979, Price Pfister Brass Manufacturing was merged into Norris Industries, Inc. which expressly assumed all of Price Pfister Brass Manufacturing's liabilities (Attachment C) In approximately 1981, Norris Industries became Norris-NI Industries, Inc. In 1983, Norris-NI Industries, Inc. merged with and changed its name to NI Industries (Attachment D) From 1979 to 1983, Norris Industries, Inc. or its successors Norris-NI Industries, Inc. and (subsequently) NI Industries, Inc. ran an operating division known as Price Pfister Division of NI.</p> <p>On May 18, 1983, NI Industries, Inc. created a new Delaware corporation named Price Pfister, NI Industries Inc. (Attachment E) . On June 24, 1983, pursuant to a Stock Subscription Agreement and Operating Agreement, Price Pfister, NI Industries Inc. issued all of its stock to NI Industries Inc., thereby becoming a wholly-owned subsidiary of NI. NI Industries Inc. transferred to Price Pfister, NI Industries Inc. personal property of the Price Pfister Division of NI connected with the manufacture and sale of plumbing equipment marketed under the name "Price Pfister" or "Bedford Brass". In addition, Price Pfister, NI Industries Inc. assumed the liabilities of NI Industries Inc. related to certain leasehold interests and all accounts payable and other then-current obligation of the Price Pfister Division of NI. No environmental liabilities of Price Pfister Brass Manufacturing or its successor NI Industries, Inc. were transferred to Price Pfister, NI Industries Inc. (Attachment F).</p> <p>On June 27, 1983, PPC Venture purchased certain real property and all of the stock of Price Pfister, NI Industries Inc. from NI Industries, Inc. (see Attachment G). Price Pfister, NI Industries Inc. changed its name to Price Pfister, Inc., on June 29, 1983. (Attachment H).</p>
7. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates and identify all former business structures under which it existed or operated at the Facility.	Price Pfister, Inc. is a corporation.

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8. For each business structure under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure, the name(s) it used, and the Facility addresses at which it operated or was otherwise located.	Price Pfister, Inc. was incorporated in 1983 and operated at 13500 Paxton Street, Los Angeles, CA until 2002 when the facility was shut down.
9. Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.	Price Pfister's Articles of Incorporation and its amendments are attached as Attachment I.
10. If the Company is or was operating under a fictitious business name at the Facility, identify the fictitious name and the owners) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.	Price Pfister is not and has not operated under a fictitious name.

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<p>11. Provide the dates the Company, under any of its current or former business structures, owned the Facility. Identify all parcel numbers and street addresses associated with the Facility and provide a copy of the title documentation evidencing the Company's ownership of the Facility.</p>	<p>Price Pfister, Inc. owned the Facility from June 27, 1983 until June 2004.</p> <p>From a public records search, the following addresses have been identified for the Facility:</p> <ul style="list-style-type: none"> • 13500 Paxton Street: Entire Subject Property • 13339 Louvre Street: Louvre Street Parking Lot • 13351 Louvre Street: Building A • 13355 Louvre Street: Building A • 13357 Louvre Street: Building A • 13379 Louvre Street: Building B • 11034 Sutter Avenue: Building J (Price Pfister and Others) • 11060 Sutter Avenue: Building D • 11080 Sutter Avenue: Building P • 11150 Sutter Avenue: Building P • 11151 Sutter Avenue: Building P <p>The following parcel numbers have been identified:</p> <ul style="list-style-type: none"> • 2535-002-011 • 2535-002-002 • 2535-002-006 • 2535-002-007 • 2535-003-003 • 2535-003-004 <p>Please see Attachment J hereto which presents a Site Plan with former building locations, assessor parcel numbers, and street addresses for the subject property. A review of the County of Los Angeles Tax Assessors website indicates the parcel numbers for the northern portion of the Site have recently been changed (likely in accordance with proposed redevelopment plans). Current parcel maps obtained from the website are also included in Attachment J.</p> <p>Price Pfister does not have any title reports for the Facility.</p>
<p>12. For any period of time in which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessee. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.</p>	<p>Price Pfister allowed the Pacoima Skill Center to use the Louvre Street parking lot in the 1990's. The school had various mobile trailers on that parking lot. Price Pfister has been unable to locate a copy of any lease.</p>

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13. Provide the dates that the Company, under any of its current or former business structures, operated at the Facility. Identify all parcels of real property involved in the Company's operations at the Facility, including all street addresses associated therewith.	Please see response to EPA Requests 8 and 11.
14. For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.	Not applicable.
<p>15. Identify any individual or entity that owned or operated the Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:</p> <p>a. The dates of ownership/operation;</p> <p>b. The nature of prior or subsequent operations at the Facility;</p> <p>c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and</p>	<p>As identified from a public records search, portions of the subject property were historically occupied by others:</p> <p>13355 Louvre Street: Lynch Lumber Company (circa 1946-1950) and PPM Company (circa 1955)</p> <p>11034 Sutter Avenue: Beu Fel Products, Inc. (circa 1960) and API Systems/American Polymers, Inc./ Louis Cenegy (circa 1970)</p> <p>13339 Louvre Street: Frank Speziale (circa 1951), Fred J. Clark (circa 1954), and Krock & Wilson (circa 1966).</p> <p>1957-1979: Price Pfister Brass Manufacturing Company.</p> <p>1979 -June1983: Norris Industries (as Price Pfister Division of Norris Industries) ("PPNI").</p> <p>June 1983-June 2004: Price Pfister, Inc.</p> <p>On June 24, 2004, Price Pfister sold its real property at 13500 Paxton, Los Angeles (including the parcels listed in 11. above) to Paxton Street, LLC. Paxton Street, LLC subsequently sold a portion of the real property to Lowe's HIW and the remaining portion to Primestor Development Inc. ("Primestor").</p> <p>Price Pfister has no information on the operation of any of these entities.</p> <p>Price Pfister has no information on these entities, although it has an access agreement with both Lowe's and Primestor.</p>

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d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.	Price Pfister has no information on the operation of any of these entities.
<p>16. Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provide the following information:</p> <p>a. The employee's full name:</p>	<p>Please see the portions of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K for information regarding the use of chemicals employed in manufacturing operations, wastes generated, and chemical and waste handling and storage (Sections I and III, Exhibits 2 and 6 to 9).</p> <p>A summary of chemical/waste use/storage/disposal is also presented in the following documents which were sent to EPA on September 28, 2007:</p> <ul style="list-style-type: none"> (a) EKI's Remedial Investigation Report, dated February 7, 2003, Section 3.2, pages 3-1 to 3-3. (b) EKI's Redevelopment Remedial Action Plan, dated April 4, 2003, Section 3.3, pages 3-2 to 3-4, (c) EKI's Information Requested Related to the Former Tanks and Their Contents in the Wastewater Treatment System and Plating Area, dated October 15, 2003. <p>The primary chemicals used by Price Pfister included tetrachloroethene ("PCE"), 1,1,1 trichloroethane ("TCA"), HCFC 141B, aqueous based detergents, petroleum naphtha, cutting oil, hydraulic oil, gasoline, diesel, linseed oil, kerosene, hexavalent chromium, copper, lead, nickel, tin, zinc, nitric acid, alkaline solutions, cyanide, sodium hypochlorite, sodium metabisulfite, sulfuric acid, sodium hydroxide, buffing compound, and sand (when the foundry operated). There were also six transformers with PCBs owned by the Los Angeles Department of Water and Power. The chemicals were employed for a variety of purposes, including casting, buffing, machining, metal degreasing, electroplating, powder coating, and wastewater treatment.</p> <p>Price Pfister did not dispose of any wastes at the Facility. During the 2002-2004 site investigation, Price Pfister discovered sand from the foundry had been placed on the ground around Building L in an area that had been paved in the 1970's.</p> <p>Response deferred pursuant to agreement with EPA.</p>

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<p>b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;</p> <p>c. The dates that the employee worked at the Facility;</p> <p>d. The position(s) the employee held under any of the Company's business structures; and</p> <p>e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.</p>	<p>Response deferred pursuant to agreement with EPA.</p> <p>Response deferred pursuant to agreement with EPA.</p> <p>Response deferred pursuant to agreement with EPA.</p> <p>Response deferred pursuant to agreement with EPA.</p>
<p>17. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.</p>	<p>The Facility occupied approximately 25 acres. All manufacturing operations ceased in 2002 and there are no Price Pfister employees at the Facility.</p> <p>The Facility was bounded by Paxton Street to the north, Louvre Street to the south, and except for a small corner, by Sutter Avenue to the west and Bradley Avenue to the east. There are three parcels at the corner of Louvre and Bradley that were not part of the Price Pfister parcel as shown on the map attached as Attachment J.</p> <p>Exhibit 1 of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached as Attachment K shows the Price Pfister Site Plan and Manufacturing Process Layout when the facility was in operation. Figure 2, attached hereto as Attachment L, of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, which was sent to EPA on September 28, 2007, depicts the building construction and paving history at the Site. Review of historical aerial photographs and architectural drawings indicates that improvement of the subject property began sometime between 1949 and 1952 with construction of Building J. Building P, the largest building on the premises, covered approximately 8.5 acres on the central portion of the Site. A parking lot was located north of Building P and extended along Paxton Street between Sutter Street and Bradley Avenue. Smaller buildings were located around the perimeter of the Site. A former out of service railroad spur ran along the southern side of Building P. Buildings had been added to or expanded over time, and the Site was gradually paved between 1954 and 1995. Manufacturing operations ceased in 2002.</p> <p>Most of the buildings were demolished in 2004 and the remaining buildings were demolished in 2005. All surface pavement has been removed except in</p>

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	<p>the Louvre Street parking area which was not used for manufacturing operations. During the soil excavation, most subsurface features were removed and Primestor removed residual subsurface features during the rough grading of the northern portion in 2007. In addition, all industrial sewer lines have been removed, and both industrial and domestic sewer lines have been capped at the property boundary.</p> <p>Extensive soil excavation of the Facility was conducted in 2004-5. The northern portion of the Facility has been rough graded in anticipation of commercial redevelopment expected to take place in early to mid-2008. During this re-grading, Price Pfister understands that residual subsurface features were removed. Some areas of the southern portion of site will be redeveloped for commercial use in the near future while others are subject to further remediation in the near future.</p> <p>Price Pfister had manufactured plumbing products at the Facility. Operations included foundry which cast brass parts, machining of the castings, zinc die cast, polishing, degreasing, powder coating, plating, screw machining of brass, plastic mold injection, and assembly.</p>

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<p>18. If any substance containing chromium as a component ("chromium-related substances") was utilized in any of the Company's operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company's operations at the Facility for materials containing chromium. Include documentation evidencing the Company's use of chromium or chromium-related substances.</p>	<p>In the plating process used at the Site, parts were electroplated with copper, nickel and chromium. Solutions of chromic acid were used to electroplate brass parts. The rinses containing hexavalent chromium were treated in the wastewater treatment system (located in Central Building P). The treatment of hexavalent chromium rinses is discussed in Section 2.1 of EKI's <i>Closure Report for Permitted Waste Treatment Units</i>, dated February 27, 2004 attached hereto as Attachment M. Figure I, attached as hereto Attachment N, of EKI's <i>Information Requested Related to the Former Tanks and Their Contents in the Wastewater Treatment System and Plating Area</i>, dated October 15, 2003, sent to EPA on September 28, 2007, shows the wastewater treatment system layout and Central Building P features.</p> <p>A bar compound containing chromium (III) oxide was used in buffing and polishing metal parts. Metallic chromium was used in bronze and copper scrap used in the machine shop and buffing, and a copper base alloy casting was used in tooling. Various alloys containing chromium metal were used in tooling and arc welding.</p> <p>Chromium containing wastes were managed as hazardous wastes and sent to licensed treatment, storage, and disposal facilities. Exhibit 2 of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K provides information on tank size and tank construction details at the former facility, including tanks containing chromium-related substances as well as disposal sites. Please also see the table in Attachment O which lists disposal sites for chromium containing wastes.</p> <p>EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007, identified that the primary impact by chromium at the Facility was in central Building P by the former wastewater treatment area. Impacted soil has been excavated and Price Pfister plans to remediate groundwater. There is also a smaller area of impacted soil by the former clarifier in Building B although there is no known use of chromium by Price Pfister in this building. Price Pfister plans further excavation of soil by this clarifier.</p>

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<p>19. Provide a scaled map of the Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:</p> <p>a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.);</p>	<p>All buildings at the Facility have been demolished. Exhibit 1 of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K shows the former Price Pfister Site Plan and Manufacturing Process Layout and describes the numerous above ground tanks.</p> <p>Figure 3 of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007, presents the layout of historic Site features. A reduced copy of Figure 3 is attached hereto as Attachment P.</p> <p>Figure 1, attached hereto as Attachment N, of EKI's <i>Information Requested Related to the Former Tanks and Their Contents in the Wastewater Treatment System and Plating Area</i>, dated October 15, 2003, shows the wastewater treatment system layout and Central Building P features.</p> <p>As discussed above, the Facility was subject to extensive soil excavation, soil vapor extraction, air sparging, and free product removal. Additional remediation is planned in the areas of former Buildings A and B.</p> <p>Figure 3 of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007 shows the location of several surface structures. A reduced copy of that Figure 3 is attached hereto as Attachment P. Section I. A. of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K describes the numerous above ground tanks that had been used in the manufacturing process. There had been two above ground chlorinated solvent storage tanks (1250 and 1300 gallons) located in the Oil Staging Area (outside and south of Building P) in an area that had been bermed and epoxy coated. There was one 4,000 gallon above ground cutting oil tank and one 1,000 gallon tank of PCE on the loading dock behind Building P. There were two 550 gallon diesel oil tanks and six PCB containing transformers to the east of Building P. There were also five (5) degreasers that had used PCE, TCA or HCFC 141B as well as several Safety Kleen parts washers.</p> <p>The hazardous waste storage area in Building X had secondary containment curbs around the perimeter of storage area and four sumps (two inside and two outside of curbed area) to allow collection of spillage or rain water. See Section 7.5 of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003.</p> <p>See also response above.</p>

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<p>b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc).</p>	<p>Table 1, attached hereto as Attachment Q, of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007. Figure 3 of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007, shows the location of known sumps, vaults, and underground storage tanks ("USTs"). A reduced copy of that Figure 3 is attached hereto as Attachment P. Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K, summarizes information on some of the former USTs. That report identifies two 4,000 gallon cutting (pale) oil USTs that were installed north of Building A. There were two 1,000 gallon hydraulic oil USTs, a 1,000 gallon linseed oil UST, and a 1,000 gallon waste lubricating/cutting oil UST in the Oil Staging Area. There was also one 1,200 gallon underground storage tank used for storage of cutting oil located north of former Building B. Closure letters for these USTs are expected in the near future.</p> <p>There was a 40,000 gallon fuel oil UST outside Building P from 1975-1989. There were two former 6,000 gallon unleaded gasoline USTs to the northwest of Building P as shown on Figure 3, attached hereto as Attachment J, of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007. Closure letters have been received for these USTs.</p> <p>Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K, summarizes information on the former plating and wastewater treatment systems. The former wastewater treatment system had above ground tanks and below grade pits with in-ground secondary containment trenches.</p> <p>Building A had in-ground trenches that were used to convey chips and machine oil from work stations to a chip and oil recovery area and to contain pipes used to supply cutting machines with machine oil from storage tanks. In addition, there were concrete trenches under the die cast machines that circulated non-contact cooling water and a sump at the western end of the building that was connected to a cooling tower as discussed in section 7.2.1 of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003.</p> <p>EKI reported in Section 7.5 of its <i>Remedial Investigation Report</i>, dated February 7, 2003, that there had been a drain system and wastewater clarifier in Building B (removed in 1992) and that floor trenches, which contained closed loop cooling water piping had remained. The use of the clarifier is unknown. The floor trenches were removed during demolition of Building B in 2006.</p>

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<p>c. Groundwater and the wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);</p>	<p>There was a shared sump in the Oil Staging and drum rinse areas described in Section 7.3.1 of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003.</p> <p>There were also subgrade conveyors in the foundry that were used to transport molds containing sand and cast parts.</p> <p>Figure 3, attached hereto as Attachment J, of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007, shows the location of subgrade features.</p> <p>The wastewater treatment system in Building P consisted of twenty-two above ground process tanks and nine below ground sumps and clarifiers. The wastewater treatment system was subject to the State of California tiered permitting system or Permit by Rule ("PBR") promulgated under Section 25200 of the California Health and Safety Code ("HSC") and Section 67450 of Title 22 of the California Code of Regulations ("CCR"). See Section 7.1.1 of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003. For a summary of closure and decommissioning of the PBR units, see EKI's <i>Closure Report for Permitted Waste Treatment Units</i>, dated February 27, 2004 and sent to EPA on September 28, 2007.</p> <p>The Well Locations Map attached hereto as Attachment K shows existing well locations and Table 1 attached hereto as Attachment L provides well construction details for existing and abandoned well locations. Copies of geologic logs from deep grab groundwater locations were provided to EPA on September 28, 2007 in EKI's <i>Transmittal of Logs for Deep Borings PB42 through PB50</i>, dated September 7, 2005. Geologic conditions beneath the Site do not vary significantly from one drilling location to another; therefore the logs provided should be sufficient for a good understanding of these subsurface conditions. Groundwater well locations and well construction logs have also been presented in EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, and in subsequent groundwater monitoring and remediation progress reports provided to EPA on September 28, 2007.</p> <p>Exhibit 5 of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K, provides a storm water flow diagram.</p>

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<p>d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);</p> <p>e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and</p> <p>f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.</p>	<p>The Facility had no underground storm drain, ditches, or other water conveyance. Exhibit 4 of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K provides a diagram of the stormwater flow. Exhibit 5 of Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K provides a storm water flow diagram. Figure 3, attached hereto as Attachment J, of EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, sent to EPA on September 28, 2007, shows the former industrial and sewer lines. Both sewer lines have been removed during soil excavation.</p> <p>Price Pfister had no subsurface disposal field.</p> <p>Price Pfister ceased operations at the Site in 2002. Demolition of most Site buildings occurred in 2004 after removal of asbestos from those buildings. Soil excavation activities occurred between December 2004 and summer 2005. More than 35,000 tons of contaminated soil was removed from the Site and disposed of at two permitted disposal facilities out of the local area. Soil excavation activities are summarized in EKI's <i>Soil Excavation Completion Report</i>, dated June 17, 2005, and <i>Completion of Additional Soil Excavation</i>, dated June 30, 2005 which were sent to EPA on September 28, 2007. Concrete and asphalt not impacted by chemicals was recycled on-site and at off-site recycling facilities. Concrete and asphalt that was impacted by chemicals were disposed at permitted landfills with contaminated soil. Price Pfister also conducted soil vapor extraction, air sparging, and free hydrocarbon product removal.</p> <p>Primestor Development demolished the remaining buildings at the Facility in 2006. Price Pfister will be conducting additional excavation of chromium impacted soil at former Building B and bioremediation of pale oil and soil vapor extraction for chlorinated solvents at former Building A.</p> <p>Please refer to the response to EPA Request 16 above for information related waste storage.</p> <p>Price Pfister, Inc. had no dumps, leach field, or burn pit.</p>
<p>20. Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies regarding operations at the Facility</p>	<p>For information regarding chemical and waste use/storage/handling at the property, please see response to EPA Request 16 above and the summary of disposal sites for hazardous wastes attached hereto as Attachment P.</p>

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<p>21. Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.</p>	<p>For information regarding chemical use/storage/handling at the property, please see response to EPA Request 16 above.</p> <p>Price Pfister has over 1400 MSDSs which will not be produced at the present time under agreement with EPA.</p>
<p>22. Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; ,14-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitroso-dimethylamine (NDMA); per chlorate; dioxins and furans, which are or were used at, or transported to, the Facility:</p> <ol style="list-style-type: none"> The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product; The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of; the kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance; The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances. 	<p>Price Pfister has no information on 14-DCA.</p> <p>Price Pfister did not use TCE; 1,1-DCE; MTBE; ,14-DCA, cis-1,2-DCE; 1,4-dioxane; N-nitroso-dimethylamine (NDMA); perchlorate; dioxins or furans. However, 1,4-dioxane was listed as an incidental ingredient in TCA (which it did use) and some aerosols.</p> <p>Response deferred pursuant to agreement with EPA.</p> <p>Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K</p> <p>Wastewater from Price Pfister's operations was treated on-site and discharged to the Los Angeles Bureau of Sanitation. Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K describes management of several wastes.</p> <p>All chromium and solvent wastes were sent off-site for disposal as hazardous wastes. The attached tables in Attachment P lists the disposal sites.</p> <p>Response deferred pursuant to agreement with EPA.</p> <p>Response deferred pursuant to agreement with EPA.</p>
<p>23. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.</p>	<p>All key documents were provided to EPA on September 28, 2007. While there are additional reports on file at the Regional Board, the data in these reports is contained in the documents already provided to EPA or have been superseded.</p>

EPA Request	Response
<p>24. Identify, and provide the following information for, all groundwater wells that are located at the Facility:</p> <p>a. A map with the specific locations of the Facility groundwater wells;</p> <p>b. Date the Facility groundwater wells were last sampled;</p> <p>c. List of all constituents which were analyzed during groundwater sampling events; and</p>	<p>The attached Well Location Map (Attachment R) shows existing well locations. Groundwater well locations have been presented in EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, and in subsequent Groundwater Monitoring and Remediation Reports provided to EPA on September 28, 2007. These reports include information on wells which have subsequently been abandoned. Each <i>Groundwater Monitoring and Remediation Progress Report</i> provides a well location map, well construction details table, lists all constituents analyzed and presents the analytical results. The most recent quarterly report for third quarter 2007 includes information regarding four new groundwater monitoring wells.</p> <p>Two recent reports summarizing grab groundwater sampling results are EKI's <i>Results of Soil and Grab Groundwater Sampling for Volatile Organic Compounds</i>, dated June 7, 2007, and <i>Results of Groundwater Sampling for Total Chromium, Hexavalent Chromium and 1,4-Dioxane</i>, dated July 3, 2007. Both reports were provided to EPA on September 28, 2007.</p> <p>Based on the rapid cleanup of groundwater in areas impacted by Price Pfister operations with soil vapor extraction and air sparging, it is likely that the impact of chlorinated solvents to groundwater by Price Pfister was limited. However, the Price Pfister facility has been significantly impacted by chlorinated solvents and other volatile organics from the upgradient former Holchem facility.</p> <p>August 20-27, 2007 (results to be reported in the third quarter groundwater monitoring and remediation progress report).</p> <p>Constituents analyzed as part of the current groundwater monitoring program include volatile organic compounds; metals including total chromium, hexavalent chromium, and lead; total petroleum hydrocarbons as diesel; 1,4-dioxane; n-nitrosodiethylamine; and 1,2,3-trichloropropane. Additional constituents including perchlorate have been reported as detailed in prior progress reports submitted to EPA on September 28, 2007. Groundwater wells have been monitored quarterly since 2002. Beginning with the second half of 2007, wells will be sampled semi-annually in accordance with Regional Board requirements.</p>

EPA Request	Response
<p>d. All groundwater sampling results, reports of findings, and analytical data.</p>	<p>Groundwater sampling results have been presented in EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, and in subsequent Groundwater Monitoring and Remediation Reports provided to EPA on September 28, 2007. These reports include information on wells which have subsequently been abandoned (see Table 1 – List of Environmental Documents Transmitted to US EPA on 28 September 2007). Each <i>Groundwater Monitoring and Remediation Progress Report</i> provides a well location map, well construction details table, lists all constituents analyzed and presents the analytical results.</p> <p>Constituents analyzed as part of the groundwater monitoring program include volatile organic compounds; metals including total chromium, hexavalent chromium, and lead; total petroleum hydrocarbons as diesel; 1,4-dioxane; n-nitrosodiethylamine; and 1,2,3-trichloropropane. Groundwater wells have been monitored quarterly since 2002. Beginning with the second half of 2007, wells will be sampled semi-annually.</p> <p>Two recent reports summarizing grab groundwater sampling results are EKI's <i>Results of Soil and Grab Groundwater Sampling for Volatile Organic Compounds</i>, dated June 7, 2007, and <i>Results of Groundwater Sampling for Total Chromium, Hexavalent Chromium and 1,4-Dioxane</i>, dated July 3, 2007 (provided to EPA on 28 September 2007). These documents were provided to EPA on September 28, 2007.</p>
<p>25. Provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.</p>	<p>Deferred pursuant to agreement with EPA.</p>

EPA Request	Response
<p>26. If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.</p>	<p>Wastewater from Price Pfister's operations was treated on-site and discharged to the Los Angeles Bureau of Sanitation. Figure 1, attached hereto as Attachment M, of EKI's <i>Information Requested Related to the Former Tanks and Their Contents in the Wastewater Treatment System and Plating Area</i>, dated October 15, 2003, provided to EPA on September 28, 2007, shows the wastewater treatment system layout and Central Building P features. Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K, shows the layout of the wastewater treatment system. The industrial sewer system was removed during soil excavation as reported in the EKI's <i>Soil Excavation Completion Report</i>, dated June 17, 2005, which report was provided to EPA on September 28, 2007.</p> <p>Defer permits and analyses pursuant to agreement with EPA.</p>
<p>27. For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.</p>	<p>Please see Section 2 and Figures 2 through 7 of EKI's <i>Closure Report for Permitted Waste Treatment Units</i>, dated February 27, 2004, attached hereto as Attachment M which provides a description of the following former permitted waste treatment units located at the Site:</p> <ul style="list-style-type: none"> Unit 1000 was an on-Site industrial wastewater treatment system that was permitted as a Permit-by-Rule ("PBR") unit under California's tiered permitting system pursuant to the applicable provisions of 22 CCR § 67450 and California Health & Safety Code § 25200. This unit treated all plating wastewaters including hexavalent chrome rinses and wastewater containing heavy metals as well as other aqueous waste streams such as those from Units 2000 and 3000 containing oil water mixtures discussed below. The resulting filter cake was shipped off-site for disposal to the licensed disposal facilities listed on Attachment P. Unit 2000 was an on-Site treatment system for treatment of oily water that operated as a Conditionally Authorized Unit pursuant to California Health & Safety Code § 25200.3. The resulting aqueous waste was sent to Unit 1000 and the resulting oily waste was sent to the facilities listed on Attachment P. Unit 3000 was used to rinse raw material drums and containers. The rinseate was sent to Unit 2000 and the residual crushed drums and containers were sent offsite for recycling. It was operated as a Conditionally Exempt Unit pursuant to California Health & Safety

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	<p>Code § 25201.5.</p> <p>In addition, Price Pfister, Inc.'s <i>Well Investigation Program – Site Audit Report</i>, dated October 30, 1995, attached hereto as Attachment K, provides information regarding chemical and waste handling and storage (Sections I and III, Exhibits 2 and 6 to 9).</p> <p>Attachment P lists facilities to which hazardous wastes were sent.</p>
28. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.	Please see response to EPA Request 27 above.
29. Please describe the method used by the Company to remove waste streams from sumps at the Facility.	Please see response to EPA Request 27 above.
30. Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.	Please see response to EPA Request 27 above.
<p>31. Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:</p> <p>a. The date each release occurred;</p>	<p>Price Pfister has no information on any specific leak, spill or other releases of hazardous substances at the Facility other than as disclosed. However, metals, oils, chlorinated solvents, and other materials have been detected in soil and groundwater under the Facility as discussed below.</p> <p>EKI's <i>Remedial Investigation Report</i> ("RI"), dated February 7, 2003, and sent to EPA on September 28, 2007 summarizes Site subsurface investigations (soil, soil vapor and groundwater sampling) conducted through January 2003 which identified potential releases of chemicals to the subsurface (Section 3.3 and 7.0). The RI identified chemical source areas at the Site and characterized the distribution of chemicals in soil, soil gas, and groundwater originating from these sources. The RI identified sources at four areas of the Price Pfister property for chemicals of concern. These areas are: (1) Central Building P Area, which housed degreasing, electroplating, and wastewater treatment operations, (2) Building A Area, which was used for screw machining, (3) Oil Staging Area, which was used for waste treatment operations and petroleum storage, and (4) the area next to the former foundry referred to as the Building L Area. Figure 4, attached as Attachment S, from EKI's <i>Remedial Investigation Report</i>, dated February 7, 2003, and sent to EPA on September 28, 2007 shows the location of these areas. The sampling results described in the RI Report have been supplemented by additional investigations as summarized in other reports provided to the EPA on September 28, 2007, in</p>

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	<p>particular the EKI's <i>Soil Excavation Completion Report</i> dated June 17, 2005 and EKI's <i>Additional Soil and Groundwater Investigation Report Area 7 (Former Building A Area)</i>, 13500 Paxton Street, Pacoima, California dated July 18, 2006. These reports were provided to EPA on September 28, 2007.</p> <p>Remediation of prior releases at the Site (as identified by Site characterization activities) have included soil vapor extraction, in situ air sparging, recovery of free hydrocarbon product, and soil excavation.</p> <p>EKI's <i>Quarterly Monitoring and Remediation Progress Report, Second Quarter 2004</i>, dated July 14, 2004 and sent to EPA on September 28, 2007, summarizes operation of the two soil vapor extraction systems (located in the former degreaser and Oil Staging areas of the Site) from September 2002 to May 2004, two <i>in situ</i> air sparging systems which operated from June 2003 to May 2004, and a free hydrocarbon product ("FHP") recovery system (located in the former Building A Area) which were all decommissioned in 2004 prior to demolition of Site structures and soil excavation activities, all as approved by the Regional Board. The final cumulative masses of VOCs removed at Central Building P and Oil Staging Areas was approximately 1,200 pounds and 920 pounds, respectively. The total FHP recovery in the Building A area (performed from 1995 to 2004) was approximately 5,800 gallons. Attachment P lists the locations where hazardous wastes were sent.</p> <p>EKI's routine Quarterly Groundwater Monitoring and Remediation Progress Reports in 2006 and 2007 summarize additional soil vapor extraction activities completed in the former Oil Staging area following excavation activities (from August 2006 to July 2007). The cumulative mass of VOCs removed in the former Oil Staging area was approximately 50 pounds. The system was shut down in July 2007 to perform rebound testing. Attachment P lists the locations where hazardous wastes were sent.</p> <p>EKI's <i>Soil Excavation Completion Report</i>, dated June 17, 2005, and <i>Completion of Additional Soil Excavation</i>, dated June 30, 2005, summarize soil excavation activities performed at the Site. These reports were sent to EPA on September 28, 2007. More than 35,000 tons of contaminated soil was removed from the Site and disposed of at the following two permitted disposal facilities. Excavated material that exhibited a hazardous waste characteristic was taken to Waste Management facilities in Kettleman City; other excavated material was sent to McKittrick or to recycling facilities.</p>

EPA Request	Response
<p>b. The cause of each release;</p> <p>c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;</p> <p>d. Where each release occurred and what areas were impacted by the release; and</p> <p>e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.</p>	<p>Price Pfister does not have records of specific incidents of releases, other than as disclosed herein. However, please see the response to 31.a.</p> <p>Price Pfister does not have records on any release, other than as disclosed herein. Please see the response to 31.a.</p> <p>Price Pfister does not have information on any release, other than as disclosed herein. Please see response to 31.d.</p> <p>The remediation of the Facility is being conducted under the direction of the Los Angeles Regional Water Quality Control Board.</p>
<p>32. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.</p>	<p>Price Pfister, Inc. has undertaken an extensive site investigation and remediation of the site under the direction of the Los Angeles Regional Water Quality Control Board. The documents sent to EPA on September 28, 2007 contain the relevant information on releases of hazardous substances at the facility.</p>

Submitted by:

Linda H. Biagioni
Vice President
Price Pfister, Inc.

Date

November 2, 2007